

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 19-30093-RAL

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

JACQUELINE ERNESTINE PEASE,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

Beginning on a date unknown, but no later than on or about March 2014 through on or about February 2019, in the District of South Dakota, the Defendant, JACQUELINE ERNESTINE PEASE, did embezzle, steal, willfully misapply, willfully permit to be misapplied, and convert to her own use more than \$1,000 of monies, funds, credits, goods, assets, and other property belonging to the Crow Creek Sioux Tribe ("CCST"), an Indian Tribal Organization, and did aid and abet others in committing the offense, all in violation of 18 U.S.C. '§ 2 and 1163. Among others, Defendant JACQUELINE ERNESTINE PEASE aided and was aided by Roland Robert Hawk, Sr., Francine Maria Middletent, Brandon Sazue, Tina Grey Owl, and Roxanne Sazue.

JACQUELINE ERNESTINE PEASE was the accounts payable clerk working in the finance office of the Crow Creek Sioux Tribe. PEASE held this position for

four years. For the two years prior to becoming the accounts payable clerk, PEASE worked at the front desk in the finance office and collected assistance applications.

At times relevant to this case, ROLAND HAWK was her supervisor while he also served as the CCST's Treasurer. While working in the finance office, the Defendant was responsible for drafting and issuing the checks drawn from the CCST's General Welfare Account. These checks were drafted to the Defendant and her co-defendants. The Defendant, while she also took the tribe's money, was acting at the direction and behest of HAWK and the other councilmembers whom exercised authority over the account. Defendant's offense conduct involved her receipt of more than \$40,000 but not more than \$95,000. The money received derived from the CCST's General Welfare Account. Defendant's receipt of that money was unlawful.

Date

11/8/19

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Date

11/5/19

JACQUELINE ERNESTINE PEASE
Defendant

Date

11/5/19

TERRA M. FISHER
Attorney for Defendant